

**EXHIBIT A**



Andy Liu <andy@quan.legal>

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**5:20-cv-09098-NC - Request for waiver of service of Summoms under FRCP 4(d)**

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Andy Liu <andy@quan.legal>

Thu, Dec 17, 2020 at 3:29 PM

To: LEON JEW <leon.jew@dahyee.com>

Cc: Alice Chao <alice.chao@dahyee.com>, "Ljewpt@gmail.com" <Ljewpt@gmail.com>, Tyson Lin <tyson.lin@dahyee.com>, Lauren Quan <lauren@quan.legal>, Andrew Quan <andrew@quan.legal>

Good afternoon Mr. Jew,

We filed a civil complaint (5:20-cv-09098-NC ) against the various entities to which your representation in the Talece will probably extend.

We are not sure about the business hours of some of the corporate defendants due to Covid-19 restrictions current in place in the Santa Clara County, and thus respectfully request, pursuant to FRCP 4(d), that these defendants accept service by returning a signed copy of the Notice Of Lawsuit And Request To Waive Service Of Summons, an example of which is provided below:

[https://cand.uscourts.gov/wp-content/uploads/forms/civil-forms/AO\\_398.pdf](https://cand.uscourts.gov/wp-content/uploads/forms/civil-forms/AO_398.pdf).

Please let us know whether the potential defendants intend to comply with FRCP 4(d). If Defendants fail to comply with Rule 4(d), we will ask the court to award attorney fees and costs for effectuating the service of summons.

Thank you.  
Andy Liu

**EXHIBIT B**



Andy Liu <andy@quan.legal>

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**5:20-cv-09098-NC - Request for waiver of service of Summoms under FRCP 4(d)**

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**LEON JEW** <leon.jew@dahyee.com>

Fri, Dec 18, 2020 at 12:30 PM

To: Andy Liu <andy@quan.legal>, Lauren Quan <lauren@quan.legal>

Cc: Alice Chao <alice.chao@dahyee.com>, Tyson Lin <tyson.lin@dahyee.com>

Hi Andy,

It seems that you know the defendants quite well -- **none of them is my client**. It was my first time hearing some of the names.

I know nothing about which lawyer(s) will represent them.

Happy Holiday!

Leon

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**From:** Andy Liu <andy@quan.legal>

**Sent:** Friday, December 18, 2020 12:16 PM

**To:** LEON JEW <leon.jew@dahyee.com>; Lauren Quan <lauren@quan.legal>

**Cc:** Alice Chao <alice.chao@dahyee.com>; Tyson Lin <tyson.lin@dahyee.com>

**Subject:** Re: Fw: 5:20-cv-09098-NC - Request for waiver of service of Summoms under FRCP 4(d)

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**EXHIBIT C**

**2nd Requet for a meet and confer re attorney fee and cost under Rule 4 - 5:20-cv-09098-EJD BuildSimHub Inc. v. Beijing Jianyi Investment Development (Group) Co. Ltd. et al Notice of Appearance**

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## EXHIBIT D

LAFFEY MATRIX								
History			Years Out of Law School *					
	Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
Case Law	6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
	6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
Expert Opinions	6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
	6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
See the Matrix	6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
	6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
Contact us	6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
	6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
Home	6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
	6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
Links	6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
	6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
	6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
	6/01/07- 5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
	6/01/06- 5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
	6/1/05- 5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
	6/1/04- 5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
	6/1/03- 6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
	6/1/02- 5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
	6/1/01- 5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
	6/1/00- 5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468